

FILED

MAR 16 2017

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DESIREE HILL,

Defendant.

N

**4:17CR00129 AGF**

**INFORMATION**

**COUNT 1**

(Conspiracy to Defraud)

The United States Attorney charges that:

**A. CONSPIRACY**

1. Beginning on or about July 9, 2014 and continuing through on or about May 22, 2015, in the Eastern District of Missouri and elsewhere, the defendant,

**DESIREE HILL,**

and persons known and unknown to the Grand Jury did unlawfully, willfully, and knowingly combine, conspire, and agree with persons known and unknown to the grand jury to commit the following offenses against the United States:

- a. to execute a scheme and artifice to defraud federally insured financial institutions, in violation of Title 18, United States Code, Section 1344 and

- b. to make, utter, and possess a counterfeited security of an organization, with an intent to deceive an organization, in violation of Title 18, United States Code, Section 513(a).

**B. OBJECT OF THE CONSPIRACY**

2. The object of the conspiracy was for the defendant, **DESIREE HILL**, and persons known and unknown to the Grand Jury to achieve a common goal, that is: to profit from passing counterfeit checks at federally insured financial institutions.

**C. OVERT ACTS**

3. In furtherance of and to effect the objects of the conspiracy, one or more of the co-conspirators committed and caused to be committed one or more of the following overt acts in the Eastern District of Missouri and elsewhere;


- a. Between on or about August 14, 2014 and continuing to on or about May 20, 2015, P.W. produced counterfeit checks drawn on the various business accounts;
- b. On or about May 6, 2015, **DESIREE HILL** opened a checking account at U.S. Bank, a federally insured financial institution, located within the Eastern District of Missouri with a cash deposit of \$25.00;
- c. Between on or about May 6, 2015 and continuing to on or about May 20, 2015, P.W. provided a counterfeit check bearing the names of fictitious businesses to **DESIREE HILL**;

d. On or about May 6, 2015, **DESIREE HILL** deposited the counterfeit check bearing the name of a fictitious business into her financial account in the amount of \$489.00; and,

e. On or about May 6, 2015, **DESIREE HILL** used the debit card and personal identification number issued by U.S. Bank to withdraw \$220.00 from her financial account.

All in violation of Title 18, United States Code, Section 371.

Respectfully submitted,  
RICHARD CALLAHAN  
United States Attorney

  
TRACY L. BERRY 014753 TN  
Assistant United States Attorney  
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St. Louis, Missouri 63102  
(314) 539-2200

UNITED STATES OF AMERICA       )  
EASTERN DIVISION                )  
EASTERN DISTRICT OF MISSOURI   )

I, Tracy L. Berry, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

  
\_\_\_\_\_  
TRACY L. BERRY

Subscribed and sworn to before me this 9th day of March 2017.

  
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CLERK, U.S. DISTRICT COURT

By:   
\_\_\_\_\_  
DEPUTY CLERK